

ROSS A. HAEBERLE * HSE ADVISOR

ANADARKO PETROLEUM CORPORATION • 1201 LAKE ROBBINS DRIVE • THE WOODLANDS, TEXAS 77380
MAIL: P.O. BOX 1330 HOUSTON, TEXAS 77251-1330 U.S.A. PH. (832) 636-2882



June 30, 2014

Mr. James Sales
EPA Region 6 PCB Coordinator
1445 Ross Avenue
Dallas, Texas 75202
214-665-6796

RE: Westlake Gas Plant Site, Nolan County, Texas – Supplemental Information to Remedial Action Plan

Mr. Sales;

Anadarko respectfully submits this letter as a supplemental document to the Remedial Action Plan for the remediation of Polychlorinated Biphenyls (PCBs) at the Former Westlake Natural Gasoline Plant which was submitted to you on May 22, 2014. This letter requests that remediation of the on-site soils and concrete impacted with PCBs be performed under 40 CFR 761.61(a) - *Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste*.

The PCB impacted materials are located approximately 4.5 miles north of the town of Maryneal in Nolan County, Texas. The property is an unoccupied area which is surrounded by ranch land. The portion of the property which contains soils with concentrations of PCBs > 1 ppm is entirely enclosed inside a five-strand barbed wire perimeter fence. That portion of the property which contains PCB impacted soils with concentrations greater than 25 ppm is enclosed within an additional three-strand wire fence (wholly inside the perimeter fence). The five-strand perimeter fence is accessible by two lockable gates, one on the northeast corner of the former plant site and one on the southwest corner of the former plant site.

Since the area to be cleaned up is not occupied, is fenced and has only limited access, the area is considered to be a low occupancy area as defined in 40 CFR 761.3.

As indicated in 40 CFR 761.61(a)(4)(i)(B), the cleanup level for bulk PCB remediation waste in low occupancy areas is ≤ 25 ppm, therefore, all on-site soil and concrete with PCB concentrations > 25 ppm will be removed and properly disposed. Materials with PCB concentrations ≥ 50 ppm will be disposed at the Waste Control Specialists (WCS) facility in Andrews County, Texas and materials with PCB concentrations > 25 ppm, but < 50 ppm may be disposed at the WCS facility or they may be disposed at the Republic Regional Landfill in Abilene, TX.

Following the removal of on-site materials with PCB concentrations greater than 25 ppm, verification soil samples will be collected from the bottom of each excavation. Samples will be collected using the

methods described in 40 CFR 761.286 to a maximum depth of 7.5 centimeters (approximately three inches), however, it is requested that dedicated plastic or vinyl hand trowels be used rather than the core samplers described in the method. The square grid verification method described in 40 CFR 761.283 (Subpart O) for non-point source areas will be used to verify that cleanup of soils with PCB concentrations > 25 ppm is complete. As described in 40 CFR 761.283(b)(2), the spacing between grid samples points is to be 1.5 meters (approximately 5 feet), however, due to the large acreage associated with this site, it is requested that the spacing between grid sample points be 7.5 feet rather than the prescribed 1.5 meters. Compositing of the grid point samples will be conducted using the nine-point compositing method described in 761.289(b)(1)(i); an onsite certified laboratory will composite each nine-point grid samples using the method described in 761.289(a). The area of inference using the 7.5 feet spacing between grid sample points is approximately 506 square feet per composite sample as compared to approximately 218 square feet when using the prescribed 1.5 meter spacing. The 506 square feet inference area corresponds closely with the 500 square feet which was recommended in the Remedial Action Plan submitted to you on May 22, 2014. Composite verification samples will be analyzed for PCBs by a certified laboratory.

If there are any questions or comments, please call me at (832) 636-1000 or email at ross.haeberle@anadarko.com.

Very Truly Yours,



Ross Haeberle
HSE Advisor
Anadarko Petroleum Corporation

Cc: Linda Kuhn
Kurt Webber, AECOM